



How TMDLs Will Affect Permit Issuance?

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Why do TMDLs get into LPDES permits?

BAYOU DES ALLEMANDS WATERSHED TMDL
FOR BIOCHEMICAL OXYGEN-DEMANDING SUBSTANCES

SUBSEGMENT 020301
SURVEYED SEPTEMBER 9-13, 2002


REVISED TMDL REPORT

By:
FTN Associates Ltd.

For:
Engineering Group 2
Environmental Technology Division
Office of Environmental Assessment
Louisiana Department of Environmental Quality

REVISED
April 30, 2004

PERMIT NUMBER
LA0008036
A12922


DEQ
LOUISIANA

OFFICE OF ENVIRONMENTAL SERVICES
Water Discharge Permit

Pursuant to the Clean Water Act, as amended (33 U.S.C. 1251 et seq.), and the Louisiana Environmental Quality Act, as amended (La. R. S. 30:2001 et seq.), rules and regulations effective or promulgated under the authority of said Acts, and in reliance on statements and representations heretofore made in the application, a Louisiana Pollutant Discharge Elimination System permit is issued authorizing

Cleco Power, LLC
Rodemacher Power Station
2030 Donahue Ferry Road
Pineville, LA 70821

Type Facility: existing steam electric power generating facility
Location: 275 Rodemacher Road in Lena, Rapides Parish
Receiving Waters: a tributary to subsegment 100101 of the Red River Basin

Discharge in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, and III attached hereto.

Permit shall become effective on _____

This permit and the authorization to discharge shall expire five (5) years from the effective date of the permit.

Issued on _____

Chuck Carr Brown, Ph.D.
Assistant Secretary

GALVETZ BUILDING • 602 NORTH 1ST STREET • P.O. BOX 4313 • BATON ROUGE, LA 70821-4313 • PHONE (225) 219-5181



Federal TMDL Regulations

- Clean Water Act Section 303(d)
- EPA Implementing Regulations at 40 CFR Part 130.7
- Upon final EPA approval TMDLs become part of the State Water Quality Management Plan (WQMP) where they are implemented into LPDES permits.



Implementing TMDLs into an LPDES Permit

- The permit limitations must be established based on the Waste Load Allocation (WLA) given to each individual point source in the TMDL.
- Models for the Lake Pontchartrain Basin are indicating drastic reductions (up to 94%) in permit limitations.



Lake Pontchartrain Basin TMDLs

- The Water Quality Assessment Division is currently gathering data and running the water quality models for the Lake Pontchartrain Basin.
- The information will be utilized in the development of the TMDLs.



Models for the Lake Pontchartrain Basin

- Upgrade Existing Wastewater Treatment Plants
 - Currently Effluent Limitations are generally 10 to 30 mg/L BOD₅
 - Models are indicating that existing dischargers with limitations of 30 mg/L BOD₅ will require new effluent limitations of 10 mg/L CBOD₅, and 2 mg/L NH₃-N
 - Models are indicating for existing dischargers with limitations of 10 mg/L BOD₅ will require new effluent limitations of 5 mg/L CBOD₅, 2 mg/L NH₃-N, 5 mg/L Dissolved Oxygen (minimum)
 - Treatment to these permit levels can be labor intensive and costly to achieve.





Models for the Lake Pontchartrain Basin

- New Dischargers:
 - Submit an environmental impact assessment
 - Upon evaluation of the factors associated with the environmental impact assessment:
 - Option 1 - permits with 5 BOD₅/ 5 TSS/2 NH₃/ 5 DO; or limits not to exceed 10 BOD₅ /2 NH₃
 - Option 2 - denial of permit coverage.



Models for the Lake Pontchartrain Basin

- New sources may not be allowed to discharge or may be forced to relocate.
 - Potentially no new development
 - Potentially significant economic hindrance



What can interested parties do?

- Stay aware of TMDL development.
 - DEQ developed TMDLs List Serve:
http://doa.louisiana.gov/oes/listservpage/ld_eq_tmdl_listserv.asp
 - EPA developed TMDL List Serve:
<http://www.epa.gov/fedrgstr/subscribe.htm>
- Provide comments (remember the TMDLs directly affect you).



Options for Affected Parties

- Nothing
- Regionalization
- Local Ordinances
- Wetland Assimilation
- Innovative Technologies for no discharge scenarios



What happens if you choose to do nothing ?

WHY THIS IS IMPORTANT TO YOU!!!!!!

- Enforcement Actions
- Consent Decree
- Penalties
- Permit Denials
- Poor Economic Development
- Continued Poor Water Quality

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Regionalization

- More affordable treatment option
 - Cost per gallon of wastewater decreases as treatment capacity increases
- Fewer treatment facilities to operate and maintain
- Potentially fewer waterbodies impacted
- Moves discharges out of neighborhood ditches



Local Ordinances

- Require approval from DEQ prior to issuing building permit
 - Request for Preliminary Determinations
 - Receive Final Permit Before Construction
- Do NOT allow developers to utilize individual home treatment units when developing subdivisions.



STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
MAIL COMPLETED FORM TO:
Office of Environmental Services, Water Permits Division
Post Office Box 4313
Baton Rouge, La. 70821-4313
Phone#: (225) 219-3181 Fax# (225) 219-3309

**REQUEST FOR PRELIMINARY DETERMINATION
OF LPDES PERMIT ISSUANCE
SECTION I – SITE CONTACT INFORMATION**

Name _____
Address _____
City _____
Zip _____ Phone _____ e-mail _____

If the wastewater treatment facility is to be owned and/or operated by a separate entity once constructed, please provide contact information for that entity.

SECTION II – SITE INFORMATION

Name of Project _____
Physical Location of Project _____
Latitude- ____deg. ____min. ____sec. Longitude- ____deg. ____min. ____sec.
Parish _____ Anticipated Date of Discharge _____
Total No. of Planned _____ No. Phases/Filings _____ Size of Treatment _____
Dwellings _____ in Development _____ Plant (in gpd) _____
Is community/municipal wastewater treatment available? Please explain.

SECTION III – SITE DISCHARGE INFORMATION

Provide the proposed discharge route to the first named waterbody.

SECTION III – SITE MAP

Attach to this form a topographic map which has been highlighted to show the proposed path of the wastewater from the proposed facility to the first named waterbody. Include on the map the area extending at least one mile beyond your property boundaries. Indicate the outline of the facility and the location of each proposed discharge structure.

SECTION IV – CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who are directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Print Name _____ Date _____

Signature _____
form_7214_r01
7/9/2008

Page 1
RPD



Request for Preliminary Determination



REQUEST FOR PRELIMINARY DETERMINATION

- LDEQ developed a Request for Preliminary Determination form to receive a “Head’s up” of what sanitary discharges will be coming in the near future and to allow the LDEQ to inform the permittee of the future obstacles with respect to a sanitary wastewater discharge permit.
- Problem
 - LPDES permits are required prior to discharge — not prior to construction
 - Construction general permit and building permits are issued to develop the site. These permits historically have been issued without planning in regards to the future sanitary wastewater.
 - Later, application for the discharge of sanitary wastewater from the facility is submitted. LDEQ receives the application and must either deny the permit due to water quality impairments or incorporates very stringent limitations which the permittee did not expect.
 - This can be extremely costly to the developer.



Pre-Application Meetings

- Discussion of:
 - Potential permit limitations
 - Discharge location
 - Treatment Options
 - Mitigating Factors
 - No Discharge Scenarios
 - All Permitting Obstacles



Wetland Assimilation

- LDEQ encourages new wetland assimilation projects
- Discharge of secondarily treated sanitary wastewater into a wetland for enhancement
- Are there available wetlands?



Wetland Assimilation

- **BENEFITS OF WETLAND ASSIMILATION PROJECTS FOR THE ENVIRONMENT**
 - Removes direct discharges of treated wastewater into state waterbodies
 - Can help prevent saltwater intrusion into the wetland
 - Add an abundance of needed nutrients into the wetland to stimulate plant growth
 - Carbon sequestration
- **BENEFITS FOR A PERMITTEE**
 - Less operations and maintenance costs
 - “Relaxed” limitations
 - A “green” approach to wastewater treatment
- **Link to Wetlands Assimilation Webpage:**
<http://www.deq.louisiana.gov/portal/tabid/2960/Default.aspx>



Wetland Assimilation Contact Information

Ronnie Bean, ES-Staff

Louisiana Department of Environmental Quality

Office of Environmental Services

Water Permits Division

P.O. Box 4313

Baton Rouge, Louisiana 70821- 4313

Telephone Number: (225) 219-3138

E-mail Address: Ronnie.Bean@LA.GOV



Innovative Technologies

- No Discharge Scenarios
 - Recycle
 - Reuse
- Hydrographic Release



What ideas do you have?

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QUESTIONS???

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